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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

CAROL ANN AGSTER, personal)	No. CIV-02-1686-PHX-JAT
representative of the Estate of CHARLES)	
J. AGSTER, III, deceased; CHARLES J.)	PLAINTIFFS' NOTICE OF
AGSTER, JR., and CAROL ANN)	SUBMISSION OF FORM OF
AGSTER, surviving parents of)	VERDICT
CHARLES J. AGSTER, III,)	
Plaintiffs,)	
v.)	(Assigned to the
MARICOPA COUNTY, a public entity;)	Honorable James A. Teilborg)
MARICOPA COUNTY SHERIFF'S)	
OFFICE, a division of Maricopa County;)	
MARICOPA COUNTY DEPARTMENT)	
OF CORRECTIONAL HEALTH)	
SERVICES, a division of Maricopa)	
County; JOSEPH M. ARPAIO,)	
MARICOPA COUNTY SHERIFF;)	
BETTY J. LEWIS, and JOHN DOE)	
LEWIS, her husband; BARUCH A.)	
REUSCH, and JANE DOE REUSCH, his)	
wife; LEAH R. COMPTON, and JOHN)	
DOE COMPTON, her husband;)	
KRISTINE KEMPER, and JOHN DOE)	
KEMPER, her husband; AMANDA S.)	
GARRISON, and JOHN DOE)	
GARRISON, her husband; SUSAN E.)	

1 FISHER, and JOHN DOE FISHER, her)
husband; ERICK NULPH, and JANE)
2 DOE NULPH, his wife; KATHERINA)
3 BROKSCHMIDT, and JOHN DOE)
BROKSCHMIDT, her husband;)
4 MICHAEL C. WILKINS, and JANE)
DOE WILKINS, his wife; LAURA)
5 SODEMAN, and JOHN DOE)
6 SODEMAN, her husband; JOHN DOES)
I-X and JANE DOES I-X,)
7 Defendants.)

8
9 Pursuant to the Court's Order Setting Final Pretrial Conference, Plaintiffs hereby
10 submit their Proposed Form of Verdict, which is attached hereto.

11 RESPECTFULLY SUBMITTED this 14th day of December, 2005.

12 **STINSON MORRISON HECKER**
13 **LLP**

14 By: /s/ Sean B. Berberian

15 Michael C. Manning

16 Sean B. Berberian

17 1850 N. Central Avenue, Suite 2100

18 Phoenix, Arizona 85004-4584

19 Attorneys for Plaintiffs
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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2005, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

Brian Kaven, attorney for MCSO Defendants

Richard L. Strohm, attorney for Betty Lewis

Daniel P. Jantsch and Michael D. Wolver, attorneys for Maricopa County and CHS

I hereby certify that on December 14, 2005, I served a courtesy copy of the attached document by mail, upon:

The Honorable James A. Teilborg
Sandra Day O'Connor U.S. Courthouse, Ste 523
401 West Washington Street, SPC 51
Phoenix, Arizona 85003

/s/ Brooke Campbell
